

MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

**07 C 7239**

**JUDGE CONLON**  
**MAGISTRATE JUDGE VALDEZ**

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3. The Complaint alleges that Plaintiffs "bring [sic.] this complaint for injunctive and declaratory relief pursuant to section 611 [15 USC 1681i(a)] of the Fair Credit Reporting Act in that Trans Union, LLC has place [sic.] adverse action on my credit and has refuse [sic.] to check for completeness and accuracy of the information that is in there [sic.] repository." (Compl., Ex. 1.) The Complaint then lists five (5) specific items of information which Plaintiff alleges that Trans Union has refused to "check for completeness and accuracy." (*Id.*) The Complaint, therefore, unequivocally and specifically alleges a cause of action under the Federal Fair Credit Reporting Act, 15 U.S.C. § 1681, *et seq.*

4. This Court has original jurisdiction over this action under 15 U.S.C. § 1681p. Consequently, this action may be removed to this Court by Trans Union under 28 U.S.C. § 1441(b) because this lawsuit is founded on the laws of the United States..

5. Under 28 U.S.C. § 1446(b), this Notice of Removal is timely because it has been filed within thirty (30) days of Trans Union's receipt of the initial pleading setting forth Plaintiff's claim for relief upon which this action is based.

6. Under 28 U.S.C. § 1446(a), Trans Union has attached to this Notice of Removal copies of all process, pleadings, and orders served upon or filed by it, the removing Defendant in this action.

7. By filing this Notice of Removal, Trans Union does not waive any defenses to the claims asserted by Plaintiff which may be available to it, or concede that Plaintiff has stated any claim upon which relief can be granted.

8. Trans Union further represents that this Notice of Removal will be served on Plaintiff as indicated on the attached Certificate of Service.

9. A copy of this Notice of Removal will be filed with the Circuit Court of Cook County, Illinois.

Date: December 27, 2007

Respectfully submitted,

**TRANS UNION LLC**

By: s/ Albert E. Hartmann  
One of Its Attorneys

Albert E. Hartmann (ARDC #06256064)

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**CERTIFICATE OF SERVICE**

I, Albert E. Hartmann, an attorney, depose and state that on December 27, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. I also caused a true and correct copy of the foregoing to be served on the following party at the indicated address by First Class United States Mail:

Larry Floyd  
815 North Harlem Avenue  
Oak Park, IL 60302

s/ Albert E. Hartmann  
Albert E. Hartmann